IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:	
NationsRent, Inc., et al.,[1]	Case Nos. 01-11628 through 01-11639 (PJW)
	Jointly Administered
Debtors.	Chapter 11
NationsRent Unsecured Creditor's Liquidating Trust, Perry Mandarino, not personally, but as Trustee	
Plaintiff,	
v.	District Court Case Nos. (KAJ):
3-D/Costal Oil Company	04-CV-1033
4 Star Air Hydraulics & Ind.	04-CV-1030
Action Tire Company	04-CV-1031
ADA Resources Inc.	04-CV-976
Advanced Tire Inc.	04-CV-713
Ael Leasing Co., Inc.	04-CV-767
Agovino & Asselta, LLP	04-CV-1035
Airdyne Management Inc.	04-CV-714
Allen Oil Company of Sylacauga, Inc.[1](a)	04-CV-801
Alternators Unlimited Reb.	04-CV-988
A.O.K. Tire Mart II, Inc.	04-CV-766
Archie's Truck Service	04-CV-1158
Arrow Master, Inc.	04-CV-1160
ASAP Equipment Rental & Sales	04-CV-716
Authorized Equipment, Inc.	04-CV-784

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1 NationsRent USA, Inc., NationsRent Transportation Services, Inc., NR Delaware, Inc., NRGP, Inc., NationsRent West, Inc., Logan Equipment Corp., NR Dealer, Inc., NR Franchise Company, Inc., NationsRent of Texas, LP, and NationsRent of Indiana, LP

1(a) Caption continued on the following pages.

Bay Counties Pitcock Petroleum Inc.	04-CV-1060
Black & Veatch Constr.	04-CV-1039
Blue Ribbon Tire Co., Inc.	04-CV-721
Bobcat Company	04-CV-1026
Bradenton Fuel Oil, Inc.	04-CV-1037
Burch-Lowe, Inc.	04-CV-1076
Carruth-Doggett Industries, Inc.	04-CV-723
C.G.& E.	04-CV-802
Central Tire	04-CV-995
Cintas Corp. #318, Cintas Corporation No. 2	04-CV-996
CMD Group	04-CV-726
Coleman Engineering	04-CV-1148
Collision Pro	04-CV-1149
Columbus Equipment Company	04-CV-998
Columbus McKinnon Corp.	04-CV-999
Commercial Tire Inc.	04-CV-806
Construction Machinery, Inc.	04-CV-1142
Contractors Machinery Co. Inc.	04-CV-795
Corporate Express	04-CV-1001
Cowin Equipment Company, Inc.	04-CV-728
Creative Financial Staffing	04-CV-1021
Crosscheck, Inc.	04-CV-732
Cyrk, Inc. a/k/a Cyrk Acquisition	04-CV-734
Delta BCX Printing	04-CV-1167
Delta Formost Chemical Corporation	04-CV-1170
Diamant Boart Inc.	04-CV-1104
Diamond Hydraulics	04-CV-1106
Diamond J. Transport, Inc.	04-CV-787

Diversified Credit Service	04-CV-1096
Don's Tire Service, Inc.	04-CV-1106
Dorris Cleaning	04-CV-1111
Doskocil Industries, Inc.	04-CV-1150
Dossey Holdings, Inc.	04-CV-1155
Double A	04-CV-1153
Douglass Distributing	04-CV-1114
Dutchess Forging	04-CV-1117
Ebusiness Technology partners, Inc., f/k/a PSR Professional Staffing, Inc.	04-CV-747
Ed Hart	04-CV-975
EJ Reynolds, Inc.	04-CV-722
Equipment Development Co., Inc.	04-CV-1128
Equiptechs, Inc.	04-CV-789
Falcon Power	04-CV-1130
Fischer Group	04-CV-1141
FL Hydraulic Machinery	04-CV-725
Fleetwing Corp.	04-CV-1151
Fluid Tech Hydraulics, Inc.	04-CV-1154
GCR Pensacola Truck Tire Ctr.	04-CV-730
Gene Jackson Tire Co.	04-CV-1049
GFC Leasing	04-CV-1051
GMR Marketing LLC	04-CV-731
Goodyear Commercial Tire & Service Center	04-CV-733
GSR Construction, Inc.	04-CV-768
Gullo Ford Mercury	04-CV-769
Harbor Graphics Corporation	04-CV-1007
Harte-Hanks	04-CV-739

Hick's Petroleum Distributors, Inc.	04-CV-770
Hindley Electronics, Inc.	04-CV-1013
Holt Equipment Company Co., LLC	04-CV-772
Hunt & Sons	04-CV-1019
Husqvarna Forest & Garden	04-CV-1176
ID Technologies, Inc.	04-CV-1043
Igloo Products Corp.	04-CV-1042
Illuminating Company	04-CV-1070
Industrial Hydraulics	04-CV-1075
Ingram Trucking LLC	04-CV-744
BBF, Ltd	04-CV-800
JAM Distributing Company	04-CV-1123
J&B Auto Supply, Inc.	04-CV-1162
Jeff Falkanger & Associates	04-CV-1184
Jimmy's Garage	04-CV-1080
Joe Jeter Sales	04-CV-981
John Ray and Sons Inc.	04-CV-774
Kent Demolition Tools	04-CV-987
Keson Industries Inc.	04-CV-1116
Kforce.com Inc.	04-CV-745
L&P Financial Services	04-CV-1165
Laclede Chain Mfg. Co.	04-CV-1086
Land & Sea Petroleum, Inc.	04-CV-993
Lionudakis Wood & Green Waste	04-CV-1091
Little Beaver, Inc.	04-CV-997
Lockhart Tire	04-CV-1062
M & D Distributors	04-CV-1172
M.P. Brine Inc.	04-CV-783

Maxim Group	04-CV-757
Maxout Sourcing Services	04-CV-758
Metso Minerals Industries, Inc.	04-CV-1011
Miller Bros Giant Tire Service-Jacksonville, Inc.	04-CV-1178
The Miller Spreader Co.	04-CV-1008
Mission Critical System, Inc.	04-CV-1014
Mobile Products, Inc.	04-CV-1186
Mobile Storage Group, Inc.	04-CV-1028
Morgan Auto Supply Co.	04-CV-1191
Morgan Guaranty Trust Company of New York	04-CV-1192
Morgan Marshall Industries Inc.	04-CV-763
Multiquip Inc.	04-CV-1025
Mutual Industries	04-CV-737
Naab Consulting Corp.	04-CV-1027
Nabors Radiator & Electric	04-CV-738
NACM	04-CV-1067
NAPA Auto Parts, National Automotive Parts Association	04-CV-1041
Napa Auto Parts of Franklin	04-CV-1073
Nashville Tractor & Equip. Inc. formally known as Nashville Ford Tractor	04-CV-1063
Neff Rental Inc.	04-CV-785
Nickey Petroleum Co. Inc.	04-CV-1085
Nortrax Equipment Co. SE, LLC	04-CV-1045
Nortrax Equipment Co. South LA	04-CV-1044
Nortrax NE LLC	04-CV-1064
NSTAR Electric & Gas Corporation	04-CV-1066

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Office Management Systems Inc.	04-CV-742
Olsen Tire	04-CV-792
Original Equipment Replacement Parts, Inc.	04-CV-777
Orlando Industrial Contractors	04-CV-776
OTR Tire & Supply Co.	04-CV-1088
Overland Machinery Co.	04-CV-1089
Pacific Century LSG #449	04-CV-1074
Palmer Distributing & Sales	04-CV-1055
Parkway Truck Sales, Inc.	04-CV-781
Partner Industrial Products	04-CV-1047
Parts Associates	04-CV-1056
Penick, Parr & Associates	04-CV-1092
Peterson Tire Inc.	04-CV-1061
Pipeline Supply & Service	04-CV-1098
Pratt & Whitney Canada, Inc.	04-CV-786
Pro Chem Cleaning	04-CV-1108
Progressive Tractor Corp.	04-CV-791
Promotion Solution Inc.	04-CV-790
Quick Corner CITGO	04-CV-1119
Reeder Distributors Inc.	04-CV-749
Relizon	04-CV-750
Rentlink Inc.	04-CV-1054
Rhode Island Tire Co. Inc.	04-CV-1032
Rish Equipment Company	04-CV-796
Robertson Fleet Service Inc.	04-CV-1029
S&D Tire Inc.	04-CV-1134
Saber Fleet Services, Inc. d/b/a Weiland Tire Service	04-CV-753

Sanford Auto & Truck Parts	04-CV-1140
Scotty's Oil Company, Inc.	04-CV-755
Sellers Petroleum Products Inc.	04-CV-1109
Sensormatic Electronics Corp.	04-CV-1169
Services & Materials, Co.	04-CV-1171
Sherwin-Williams	04-CV-754
SB Power Tool Corp.	04-CV-1174
Soco Group	04-CV-1159
Son Coast, Hauling, CCC	04-CV-1077
Southeastern Crane	04-CV-799
Southern Energy Company	04-CV-1084
Southern Linc	04-CV-1093
Spectra Precision d/b/a Richard B. Trimble	04-CV-1094
Speedway New Holland	04-CV-1100
Staffing Master.com	04-CV-1113
Star Tire Company Inc.	04-CV-1050
Sterling Truck of Utah	04-CV-1102
Stihl Inc. National Accounts	04-CV-1180
Stone Construction Equipment Inc.	04-CV-1183
Sullivan Palatek Inc.	04-CV-1052
Sun Coast Resources Inc.	04-CV-1188
Tacony Corporation	04-CV-808
Terex Aerials, Inc. d/b/a Terex Cranes	04-CV-973
Texana Machinery Corp.	04-CV-805
Tex Con Oil Company	04-CV-1120
Tioga Inc.	04-CV-1129
TIP Dept 0501	04-CV-1131
Tire Centers LLC	04-CV-1133

TMP Worldwide Inc. also known as Monster Worldwide, Inc.	04-CV-986
Triton Transport Inc	04-CV-1196
Truck Lease Corp.	04-CV-1198
Truck PM Corporation	04-CV-1002
Tsurumi (America) Inc.	04-CV-1005
Tullo Truck Stop	04-CV-1138
Unifirst Corp.	04-CV-1139
Uniontools, Inc.	04-CV-1009
US Imaging Solutions	04-CV-1012
US Market Inc.	04-CV-740
Valley Rubber & Gasket	04-CV-1144
Valley Tire Co., Inc.	04-CV-1194
The Valvoline Company	04-CV-759
Vector Security Inc	04-CV-1197
Vermeer Equipment of Texas Inc.	04-CV-1166
Vermeer Manufacturing Company	04-CV-1016
Vermeer Northeast	04-CV-1175
Vermeer of Tennessee, Inc.	04-CV-1071
Vermeer Sales & Service of Colorado, Inc.	04-CV-1112
Vermeer Sales and Service of Southern Ohio, Inc.	04-CV-1107
Vermeer Sales of Texas Inc.	04-CV-1189
Vickers & Asso, Inc.	04-CV-1079
Vic's Tire Service	04-CV-804
Viking Oil	04-CV-1081
Voltech Company	04-CV-1087
Wayne Miller's Mobile Tire Inc.	04-CV-1179
Randy Wendel	04-CV-1185

Worcester Truck Body Co., Inc.	04-CV-1168
World Wide Welding & Press Inc.	04-CV-1103
Defendants.	**Hearing Date: May 16, 2005 at 2:00 p.m.**

MOTION OF CREDITOR TRUST TRUSTEE FOR AN ORDER SCHEDULING AN INITIAL PRETRIAL CONFERENCE IN THE ABOVE-CAPTIONED AVOIDANCE ACTIONS ON MAY 16, 2005 AT 2:00 P.M.

The NationsRent Unsecured Creditors Liquidating Trust (the"Creditor Trust"), by and through its undersigned counsel, hereby moves (the "Motion") this Court, pursuant to Federal Rule of Civil Procedures 16(a) and Rule 16.2(a) of the Local Rules of Civil Practice and Procedure for the United States District Court for the District of Delaware, for an order scheduling an initial pretrial conference in the above-captioned avoidance actions on May 16, 2005 at 2:00 p.m. (the "Initial Conference"). In support of this Motion, the Creditor Trust states as follows:

BACKGROUND

1. On December 17, 2001 (the "Petition Date"), NationsRent, Inc. and certain of its direct and indirect affiliates (collectively the "Debtors") filed petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

2. The Debtors continued to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107 and 1108 of Bankruptcy Code.

3. On May 14, 2003, this Court entered an order confirming the First Amended Joint Plan of Reorganization of NationsRent, Inc. and its Debtor Subsidiaries,

dated as of February 7, 2003, as modified (the "Plan"). The Plan became effective on June 13, 2003 (the "Effective Date").

4. Pursuant to the Plan, the Creditor Trust was established as of the Effective Date and was granted the right to, among other things, pursue avoidance actions under section 547 of the Bankruptcy Code.

5. Between December 11, 2003, and December 16, 2003, the Creditor Trust filed approximately 465 complaints (the "Preference Actions") in the Bankruptcy Court seeking to avoid and recover preferential payments made by the Debtors to their creditors within 90 days of the Petition Date pursuant to sections 547 and 550 of the Bankruptcy Code.

6. On or about June 29, 2004 and August 25, 2004, the United States District Court for the District of Delaware (the "District Court") withdrew the reference to the Bankruptcy Court of the unresolved Preference Actions, thereby assuming direct control over the cases.

7. Prior to the filing of this Motion, the Creditor Trust resolved approximately 250 of the original 465 Preference Actions without the need for any formal discovery or any intervention by the Bankruptcy Court or the District Court. No pretrial conferences have been conducted by the Bankruptcy Court or the District Court.

8. At this point, approximately 210 Preference Actions remain pending. The average amount of each Preference Action claim is approximately $33,000.00. However, the 20 largest claims, or approximately 10% of the number of remaining Preference

Actions, account for nearly 45% of the total dollar amount of claims being pursued. Therefore, the average amount of each Preference Action claim, excluding the 20 largest claims, is approximately $20,000.00.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).

RELIEF REQUESTED

10. The Creditor Trust seeks an order, pursuant to Rule 16(a) of the Federal Rules of Civil Procedure and D. Del. LR 16.2(a), (A) setting an initial pretrial conference before this Court on May 16, 2005 at 2:00 p.m.; and (B) fixing a scheduling conference to be conducted approximately four months thereafter.

11. Federal Rule 16(a) provides that, "[i]n any action, the court may in its discretion direct the attorneys for the parties and any unrepresented parties to appear before it for a conference or conferences before trial for such purposes as (1) expediting the disposition of the action. . . (3) discouraging wasteful pretrial activities . . . and (5) facilitating settlement of the case." In addition, D. Del LR. 16.2(a) also contemplates the scheduling of an Initial Conference to address the nature of the case, any special difficulties, a proposed date for a scheduling conference and requests for modifying the mandatory disclosure requirements.

12. The Plaintiff submits that the scheduling of an Initial Conference is necessary and appropriate to facilitate the prompt and efficient resolution of the

remaining Preference Actions. As noted above, the average amount of each Preference Action claim is only $33,000. Moreover, when the largest 20 claims are excluded, the average Preference Action claim is only $20,000. In order to promote judicial economy and the efficient administration of justice, all reasonable efforts should be undertaken to attempt to settle each remaining Preference Action before the parties are required to engage in formal pretrial discovery and other potentially costly proceedings which would require Court involvement. Accordingly, the Plaintiff requests that the Court schedule an Initial Conference at which the Court would (a) direct the parties to engage in good faith negotiations and meet and confer sessions during the next four months; (b) fix a scheduling conference pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and D. Del. LR. 16.2(b) to be conducted at the conclusion of the negotiation period; and, (c) address any other relevant issues. The attendance of attorneys for parties and any unrepresented parties at the Initial Conference is needed to facilitate the settlement and efficient administration of the remaining Preference Actions.

13. The Creditor Trust and its counsel will continue to attempt to resolve the remaining Preference Actions without Court intervention. Nonetheless, scheduling the Initial Conference will facilitate the timely resolution of the remaining Preference Actions and the identification of those matters that may require more extensive pretrial and trial proceedings.

NOTICE OF INITIAL CONFERENCE

14. Counsel for the Creditor Trust intends to serve, by regular first class mail, a copy of the Notice of the Initial Pretrial Conference, a copy of which is annexed hereto

as Exhibit "A", upon counsel for all parties that have filed a pleading in response to the complaints and upon the last known addresses of each defendant that has not filed a responsive pleading within two business days of the entry of such order.

15. The Creditor Trust submits that no notice of this Motion is required pursuant Federal Rule of Civil Procedure 16(a) and D. Del. LR. 16.2(a).

16. Pursuant to D. Del. LR. Rule 7.1.2(a), the Creditor Trust waives its right to brief this Motion but reserves the right to file a brief in reply to any objections filed to this Motion.

WHEREFORE, the Creditor Trust respectfully requests that the Court grant this Motion, set an initial pretrial conference on May 16, 2005 at 2:00 p.m. in the above-captioned cases, and grant such other and further relief as the Court deems just and proper.

Dated: April 19, 2005

THE BAYARD FIRM

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